

GINA GILBERT WINSPEAR, ESQ.
Nevada Bar No. 005552
gwinspear@dennettwinspear.com
DENNETT WINSPEAR, LLP
3301 N. Buffalo Drive, Suite 195
Las Vegas, Nevada 89129
Telephone: (702) 839-1100
Facsimile: (702) 839-1113
Attorney for Defendant
PROGRESSIVE COMMERCIAL ADVANTAGE
AGENCY, INC.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

TIN V. NGUYEN,

Plaintiff,

vs.

PROGRESSIVE COMMERCIAL ADVANTAGE
AGENCY, INC., and LYFT, INC., a California
Corporation, DOES I-X, and ROE
CORPORATIONS I-X, inclusive,

Defendants.

Case No.: 2:22-cv-00741-CDS-EJY

STIPULATION AND ORDER TO
SUBSTITUTE PARTY DEFENDANT
AND CHANGE CAPTION

Plaintiff Tim V. Nguyen ("Nguyen"), by and through counsel Kevin M. Hanratty, Esq., Defendant Lyft, Inc. ("Lyft"), by and through its counsel Louis E. Garfinkel, Esq. and Jon Carlston, Esq., and current Defendant Progressive Commercial Advantage Agency, Inc. ("Progressive"), by and through its counsel Gina Gilbert Winspear, Esq., hereby stipulate and agree to substitute Defendant United Financial Casualty Company ("United Financial") in place of Defendant Progressive.

United Financial represents that its Commercial Auto Insurance Coverage, Policy Number 06253398-0, was in effect at the time of the June 10, 2020 accident at issue in Plaintiff's Complaint and as such United Financial agrees that it should be the named party defendant.

Pursuant to Federal Rule of Civil Procedure 15, Nguyen, Lyft, Progressive, and United Financial stipulate and agree that (1) the Complaint in this action shall be deemed amended to change the name of the party defendant from Progressive Commercial Advantage Agency, Inc.

1 to United Financial Casualty Company; (2) the Answer in this matter shall be deemed to be the
2 answer on behalf United Financial Casualty Company, and amended to change the name of the
3 party defendant to United Financial Casualty Company; and (3) the caption in this matter shall be
4 changed to remove Progressive Commercial Advantage Agency, Inc. as a party defendant and
5 to substitute United Financial Casualty Company, so that it reads "Tin V. Nguyen, Plaintiff v.
6 United Financial Casualty Company and Lyft, Inc., Defendants".

7 Dated this 20th day of May, 2022.

Dated this 20th day of May, 2022.

8 **DENNETT WINSPEAR, LLP**

HANRATTY LAW GROUP

9
10 By /s/ Gina Gilbert Winspear
11 GINA GILBERT WINSPEAR, ESQ.
12 Nevada Bar No. 005552
13 3301 N. Buffalo Drive, Suite 195
14 Las Vegas, Nevada 89129
15 Telephone: (702) 839-1100
16 Facsimile: (702) 839-1113
17 **Attorney for Defendant**
18 **PROGRESSIVE COMMERCIAL ADVANTAGE**
19 **AGENCY, INC.**

By /s/ Kevin M. Hanratty
KEVIN M. HANRATTY, ESQ.
Nevada Bar No. 007734
1815 Village Center Circle, Suite 140
Las Vegas, Nevada 89134
Telephone: (702) 821-1379
Facsimile: (702) 870-1846
Attorney for Plaintiff
TIN V. NGUYEN

20 Dated this 20th day of May, 2022.

21 **REISMAN SOROKAC**

IT IS SO ORDERED.

22 By Louis E. Garfinkel
23 LOUIS E. GARFINKEL, ESQ.
24 Nevada Bar No. 003416
25 JON CARLSTON, ESQ.
26 Nevada Bar No. 010869
27 8965 South Eastern Avenue, Suite 382
28 Las Vegas, Nevada 89123
Telephone: (702) 727-6258
Facsimile: (702) 446-6756
Attorneys for Defendant
LYFT, INC.


U.S. MAGISTRATE JUDGE

Dated: May 20, 2022